



**Public Comment of Deborah Stein, J.D., Network Director of the Partnership for America's Children to
the Census National Advisory Committee On Racial, Ethnic, and Other Populations Meeting,
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Submitted by email to shana.j.banks@census.gov

My name is Deborah Stein, and I am the Network Director of the Partnership for America's Children. The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 50 member organizations in 40 states that advocate to improve policies for children at the state, local and federal level. Collectively they represent over 90% of the nation's children. Partnership members use Census data in their advocacy, and thirty Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on children for policy makers, administrators, and nonprofits.

The Partnership for America's Children served the national hub on the undercount of young children in the 2020 Decennial Census. In this role the Partnership formed and continues to co-lead a national working group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

I write today to submit the Partnership's comments for the NAC. Our comments focus on recent research indicating that there is a strong probability that the 2020 census had a worse net undercount of young children than the 2010 census. We ask the Bureau to take a number of steps to identify the causes of the net undercount, in order to improve the count in census surveys and in the 2030 census. We are also writing to ask the Census Bureau to provide critical data to help us understand the steps the Census Bureau is considering taking to ameliorate the impact of this likely net undercount, and the options available to address the consequences of the Bureau's inability (due to the pandemic) to produce 1 year ACS data for 2020.

Thank You For Your Decisions on Improving the Count of Young Children

Before I address the likely 2020 undercount, I want to commend several decisions of the Bureau.

First, we are delighted by the Bureau's decision, announced at the recent CSAC meeting, to create a cross-directorate team working to improve the count of young children across all Census Bureau demographic work. We believe that this is an important step forward in improving the count of young children which could in turn improve the allocation of federal funds to the children who need them most, ensure the appropriate political representation of communities with large numbers of young children, and give state and local policy makers better data to implement a wide range of policies and

programs affecting children. We urge the cross-directorate team to identify a liaison with the children's community so that we can provide information and insight that might support its work.

We also want to commend the Bureau for improving the demographic data collection in the Household Pulse Survey by asking for demographic data on the ages of the children in the household (by indicating if the household has children under age 5, ages 5-11, and ages 12-17). This is critical information for understanding, for example, which age groups are facing more hunger, or more challenges finding childcare.

In that context, we ask the Bureau *to report the data by child age on more topics*, since relatively few of the people using the Census Household Pulse survey have the technical capacity to use the Public Use Files. For example, it would be very helpful to have the ages of the children in households receiving the Child Tax Credit. It is critical to know how many households with children ages 5-11 are unemployed or missing work because they are struggling to find childcare, which they need for before and after school, during holidays, and in the summer. It is also critical to know how old the children are in households with hunger, and what assistance they are receiving, since child nutrition programs are available for younger children (WIC and CACFP) separately from school age children (School Breakfast and Lunch). Similarly, it would be very helpful to break out children by age group in the table on children's access to health care. State agencies that administer these programs may well not have the capacity to analyze the data for their states.

Finally, we thank the Bureau for accepting several of the NAC's May recommendations, including recommendations 31, 32, and 33, around assessing what worked for counting young children in the 2020 census, testing how to ensure that families know they are supposed to include their young children, and using those results to support more accurate data collection for all of their products. We also thank the Bureau for accepting recommendation 45 on consulting with experts to address correlation bias in the PES that affects the count of young children and other groups, and we encourage you to continue to work with outside experts to try to resolve this problem.

Recommendations in Light of Recent Analyses Suggesting A Severe 2020 Undercount of Young Children

Today, I write to urge the Bureau to take a number of steps in light of the recent research by Dr. William O'Hare strongly suggesting that the 2020 Census had a higher net undercount of children in 2020 than it did in 2010. <https://countallkids.org/resources/census-data-release-shows-the-2020-census-had-a-higher-net-undercount-of-children-than-in-2010/> We note that this is preliminary data and we will need to wait for more data to determine how many children were missed (omitted) and if the net undercount rate and omissions rate for young was higher in the 2020 Census than in the 2010 Census. However, a second analysis also supports this concern and also indicates that the count of Black and Hispanic children was worse in 2020 than in 2020. <https://countallkids.org/resources/new-report-preliminary-data-on-the-coverage-of-children-in-the-2020-census/>

We understand that the NALEO Educational Fund will be submitting comments addressing the count of Hispanic people and that the National Urban League will be submitting comments addressing the count of Black people, and we support their concerns.

We recognize that Bureau staff faced a wide range of challenges, including restrictions on funding, the pandemic, hurricanes, fires, and an artificially rushed closing to the NRFU period. We applaud the efforts they made to conduct a fair and accurate census in the face of these challenges. Nevertheless, the Bureau must take steps to try to understand what led to the likely significant undercount, to share data and/or analyses that will allow stakeholders to better understand the factors driving the net undercount and omissions, to ameliorate the effects of the likely undercount, and to use analysis of the 2020 census to improve the 2030 census and other demographic products.

Areas for research and data disclosure

While the Bureau says it reached almost every household on the master address file (MAF), by itself that is not a measure of accuracy or completeness. There are at least two major ways that the Bureau could reach every household on the MAF and still have significant undercounts. First, the MAF may have been incomplete. Second, there may have been significant “within household omissions” which are different from “whole household omissions”, sometimes called unit omissions.

We call on the Bureau to conduct research to identify the causes. We see two major areas of research.

First, they should conduct research now to see how accurate the development of the MAF was, particularly with reference to household units being divided within buildings, basement apartments, and other housing units not easily identified from either in-office or field canvassing MAF development. The PES could usefully compare in-office areas versus field canvassing areas in this regard. It could also be useful to evaluate the accuracy of the MAF for communities that participated in LUCA versus those that did not.

Second, we think the Bureau should conduct evaluations of “within household omissions” and release data for small areas on census processes so that outside stakeholders can also conduct their own analyses. We do not think this kind of data would violate Title 13 because it would not identify any individual or their characteristics. Rather it would identify the processes. We suggest the following approaches:

- The Bureau should release substate operational and quality metrics for stakeholder review. The Census Bureau released 2010 Census substitution rates below the state level allowing data users to better understand the quality of the data for congressional districts, counties, metropolitan statistical areas and micropolitan statistical areas. Knowing the extent of incomplete enumerations (substitutions) and the frequency of use of administrative record data and proxy data in lieu of enumeration provides important information that allows stakeholders to identify areas where the count was more complete and less complete. Adding this to operational metrics on source of enumeration (self-response versus NRFU) is critical to understanding the success of local outreach and promotion efforts. The released state-level data and the distributions of county rates will not enable the type of analysis that is needed to gauge what worked in 2020. Ideally such data would be available at the tract level but higher geographic levels including county and congressional district are very reasonable to release given the historic precedent. The Census Bureau has explained the limited release of these metrics as needed to safeguard privacy of responses. It isn't at all clear why such a release would even indirectly be a potential disclosure of a census response. Certainly, for the larger geographies such as congressional districts and large counties, the release of quality and

operational metrics suggest no risk of disclosure. We would like to know more about the rationale for this decision.

- Reviewing nonresponse rates to questions within the questionnaire, and looking for variations by geography, and also comparing self-response rates to use of NRFU, administrative data and proxy data could be useful. When people just respond how many people live at an address and don't offer data on race, ethnicity or age, we lose data on young children, Blacks, and Hispanics. We know generally that self-response data is the highest quality data but it would be very valuable to measure how each of the other forms of data compare to self-response rates on these questions for small geographic areas.
- Evaluating the quality of administrative data. We continue to have grave concerns about the completeness of administrative data in at least three respects and to urge that it be used as a supplement to more direct methods of counting people, not a replacement. Where tax records are used, the Bureau should explicitly look for and use other administrative records that capture the second (or third, or fourth) household at the same address. We note that nearly 5% of all households were counted using administrative data (<https://www2.census.gov/about/partners/cac/nac/meetings/2021-05/presentation-2020-census-data-quality.pdf>) so the concerns we list here could contribute to a significant portion of the undercount of young children.
 - The Bureau has acknowledged that their tax record administrative data sources include no information on children born in the first three months of the decennial census year, because those children would not be included in their parents' tax returns for the year before.
 - Tax returns do not include data on race or ethnicity.
 - Tax returns are often provided by a different household unit than the census is measuring. Tax returns only include the taxpayer, their spouse, and their dependents. But many residences include at one address two or more tax units that form one household for census purposes. A single address on the MAF might house the homeowner or renter and the people on their tax return, older family members such as parents who have too little taxable income to file a tax return, young parents and their children who cannot afford their own home and make too little to file a tax return, nonmarital partners and their children who do not belong on the primary taxpayers return and do not file their own return. The tax definition of a dependent that would show up on someone's return also has a relationship test, an immigration status test, and a requirement that they lived in the household more than six months in the tax year. All of these criteria mean people living in the household who should be counted in the census will not appear on the tax form. These "doubled up" households will simply not be counted if the Bureau relies on tax record administrative data instead of direct contact or after only minimal efforts to make direct contact.

In addition, we would like to hear more from the Census Bureau about their administrative records census experiment in the 2020 Census. When will information from this experiment be available? How will findings be released? How will it shed light on the count of young children?

Census steps to ameliorate the consequences of an undercount

The consequences of undercounts of particular demographic groups could be severe. One of the impacts would be the consequences for allocating federal funding. We understand that the Bureau is considering an alternative approach to developing its yearly Post-Census Population Estimates (at least for Vintage 2021 Estimates). The new method is called the blended base. This new approach would rely on detailed demographic data and start from the 2010 Census blended with some data from the 2020 Census as the base for yearly population estimates. We ask the Bureau to release more information about this approach. Specifically, we ask for information on

- the process of the development of the blended base (who is involved, whether the development includes an assessment of its impact on data on young children and racial and ethnic groups),
- a detailed description of how the blended base is constructed
- a comparison of the blended base for 2022 estimates calculated using the 2020 census, so that we can understand whether the blended base would provide a more accurate source of estimates than the decennial census data, specifically looking at the numbers for young children, Blacks and Hispanics
- the ways in which the Population Estimate Program, and therefore a blended base, affects the allocation of federal funding, including how it may shape the ACS and other data sources that some agencies are using,
- the role of the Bureau in providing data to federal agencies that allocate federal funds, including whether they provide an analysis of the different options with respect to age, race and ethnicity, and
- disclosure of other ways that the Population Estimates are used to shape law, policy and practice, to the extent known by the Bureau, that may affect young children. For example, we believe this data is what school demographers use to draw district and school boundaries.

While we understand that the Bureau does not make the decisions about which data to use in allocating funding, it does prepare the data, including this alternative blended base approach, and advise the agencies on what the different options are. The Bureau should include assessment of the impact on young children, Blacks, and Hispanics, as it develops the blended base and explains it to agencies

We also understand that many agencies have used the ACS for allocating funding. Therefore, we ask the Bureau to disclose what alternatives it is suggesting to agencies given that the pandemic and related challenges made it impossible to produce 2020 ACS data. We are concerned that if agencies use older data, or data that averages across several years, the funding allocations might not go to the places with the most need or most in line with Congressional intent, because there was so much residential disruption during the pandemic. If the Bureau disclosed what data options are available to the agencies, and broke out the data option consequences by age, race and ethnicity, stakeholders could better understand the implications for their constituents and possibly make suggestions to improve funding allocation given these challenges.

Thank you for considering our recommendations, and for giving us this opportunity to comment.

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